

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GENTEX CORPORATION, a Delaware
Corporation,

Plaintiff,

v.

GALVION LTD. and GALVION INC.,

Defendants.

Case No. 19-921-MN

JOINT MOTION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER

Plaintiff Gentex Corporation (“Gentex”) and Defendants Galvion Ltd. and Galvion Inc. (together, “Galvion”) (collectively, the “Parties”) respectfully request that the Court amend the Scheduling Order (D.I. 92) in the instant action in the manner set forth below.

<u>Scheduling Order Paragraph</u>	<u>Event</u>	<u>Current Deadline</u>	<u>Amended Deadline</u>
N/A	Gentex identifies no more than twenty (20) asserted claims	N/A	August 27, 2021
N/A	Galvion identifies no more than three (3) invalidity grounds for each asserted claim	N/A	September 3, 2021
¶ 8(f)	Opening Expert Reports on Issues for which the Party Bears the Burden of Proof	September 7, 2021	September 24, 2021
¶ 8(f)	Rebuttal Expert Reports	October 7, 2021	October 20, 2021
¶ 8(f)	Reply Expert Reports	November 5, 2021	November 12, 2021

¶ 8(a)	Close of Expert Discovery	December 8, 2021	December 17, 2021
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The remaining deadlines in the Scheduling Order, including those for dispositive motions and trial remain unchanged.

The Parties submit that good cause exists for this proposed scheduling amendment as this amendment enables the Parties sufficient time to narrow the asserted claims and invalidity references in advance of expert discovery while maintaining the current dispositive motion and trial dates. Accordingly, the Parties respectfully request that the Court extend the case deadlines as set forth above.

Pursuant to Local Rule 16.4, the undersigned counsel for each Party certifies that it has provided a copy of the instant motion to its respective client(s) and obtained the client(s)' consent to this requested scheduling amendment.

Dated: August 3, 2021

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

SHAW KELLER LLP

/s/Amy M. Dudash

John V. Gorman (# 6599)
Amy M. Dudash (# 5741)
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
(302) 574-3000
john.gorman@morganlewis.com
amy.dudash@morganlewis.com

Attorneys for Plaintiff

/s/Nathan E. Hoeschen

Karen E. Keller (# 4489)
David M. Fry (# 5486)
Nathan Hoeschen (# 6232)
1105 N. Market St., 12th Floor
Wilmington, DE 19801
(302) 298-0700
kkeller@shawkeller.com
dfry@shawkeller.com
nhoeschen@shawkeller.com

Attorneys for Defendants

SO ORDERED this ____ day of August, 2021.

The Honorable Maryellen Noreika